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11 and MICHAEL VUICICH

12 **UNITED STATES DISTRICT COURT**
13 **CENTRAL DISTRICT OF CALIFORNIA**

14 DEJON HEMPHILL,

15 Plaintiff,

16 vs.

17 CITY OF SAN BERNARDINO;
18 JACKSON TUBBS; MICHAEL
19 VUICICH; and DOES 3-10, inclusive,

20 Defendants.

) Case No.: 5:24-cv-00825-KK-DTB

)

) **STIPULATION RE:**

)

) **1) DISMISSING SUIT WITH**

)

) **PREJUDICE; AND**

)

) **2) WAIVING ATTORNEYS' FEES**

)

) **AND COSTS**

)

) [Fed.R.Civ.P., Rule 41(a)(1)(A)(ii)]

)

) *[[Proposed] Order submitted concurrently*

) *herewith]*

21 **Matter For Determination Before The**
22 **Honorable Kenly Kiya Kato**

23 Pursuant to Federal Rules of Civil Procedure, Rule 41(a)(1)(A)(ii):

24 IT IS HEREBY STIPULATED AND AGREED by and among Plaintiff
25 Dejon Hemphill ("Plaintiff") and Defendants City of San Bernardino, Jackson
26 Tubbs and Michael Vuicich (collectively "Defendants"), through their respective
27 attorneys of record, as follows:

28 1. That the above-entitled matter shall be dismissed in its entirety, with

1 prejudice, as to all past and current Defendants;

2 2. That any and all matters now pending before the Court are moot;

3 3. That each party will bear his, her or its own costs;

4 4. That neither side shall be deemed a prevailing party by virtue of this
5 Stipulation, which is made following a settlement of the matter; and

6 5. That each party waives all claims for attorneys' fees and costs under 42
7 U.S.C. § 1988 and any other provision of law.

8 **IT IS SO STIPULATED.**

9 Respectfully submitted,

10 LAWRENCE BEACH ALLEN & CHOI, PC

11
12 Dated: March 11, 2025

By /s/ Aamir Raza

13 PAUL B. BEACH

AAMIR RAZA¹

14 Attorneys for Defendants

CITY OF SAN BERNARDINO, JACKSON

15 TUBBS & MICHAEL VUICICH

16 LAW OFFICE OF DALE K. GALIPO

17
18 Dated: March 10, 2025

By /s/ Hang D. Le

19 DALE K. GALIPO

HANG D. LE

20 Attorneys for Plaintiff

21 DEJON HEMPHILL

22
23
24
25
26
27 ¹ I, Aamir Raza, hereby attest that all the signatories listed, and on whose behalf the
28 filing is submitted, concur in the content of this Stipulation and have authorized its
filing.